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March 15, 2022

Via ECF Filing

Hon. James L. Garrity, Jr. **US Bankruptcy Court** One Bowling Green New York, NY 10004-1408

> Re: Genever Holdings LLC - Case No. 20-12411-JLG

> > Status letter – March 22, 2022 Status conference/Disclosure Statement Hearing

Dear Judge Garrity:

Please accept this status letter in advance of the next week's status conference and hearing on the approval of the Debtor's disclosure statement.

The Residence is now being actively marketed by the Sales Office and the Court approved brokers, Sotheby's, based on a listing price of \$45 million. To date, there has been one visitor to the Residence and the parties expect that the process will take several months to conclude, particularly in light of world events. All staging has been done and the Sales Officer has advised that Miles Kwok has been cooperative.

On a separate note, Miles Kwok has filed his own individual Chapter 11 case in Bridgeport Connecticut in response to enforcement and contempt proceedings filed by PAX. Mr. Kwok's personal Chapter 11 filing, however, should not adversely impact or impede the sale process in this Chapter 11 case.

The Debtor's operating reports have been filed through January 2022, and the Debtor will file the February report before next week's hearing.

As to the disclosure statement, we received everybody's comments. The Sales Officer, the Sherry Netherland and Bravo Luck are in agreement with the filed document.

PAX has a disagreement relating to the separate classification of the claims of Bravo Luck, PAX and the other unsecured creditors in Classes 2, 3 and 4, and other comments. I have confirmed with Mr. Spelfogel that he is filing an objection which may better focus the areas in dispute. After receipt and review of the objection, we will continue to discuss the plan and disclosure statement with PAX in an effort to obtain a consensus in whole or part. I will further update the Court as these discussions progress with a follow up letter on Monday.

Respectfully yours,

/s/ Kevin J. Nash

cc: Richard Morrissey, Esq. (Via ECF and email)
Douglas Spelfogel, Esq. (Via ECF and email)
Francis Lawall, Esq. (Via ECF and email)
Gabriel Sasson, Esq. (Via ECF and email)
Hon. Melanie Cyganowski (Ret.) (Via ECF and email)